

The Honorable Benjamin H. Settle

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA**

CEDAR PARK ASSEMBLY OF GOD OF
KIRKLAND, WASHINGTON,

Plaintiff,

v.

MYRON “MIKE” KREIDLER, in his
official capacity as Insurance
Commissioner for the State of Washington;
JAY INSLEE, in his official capacity as
Governor of the State of Washington,

Defendants.

NO. 3:19-cv-05181-BHS

DEFENDANTS ANSWER TO
PLAINTIFF’S REMAINING CLAIMS IN
SUPPLEMENTAL VERIFIED
COMPLAINT FOR INJUNCTIVE AND
DECLARATORY RELIEF

Defendants Myron “Mike” Kreidler, in his official capacity as Insurance Commissioner for the State of Washington; and Jay Inslee, in his official capacity as Governor of the State of Washington, (hereinafter Defendants) Answer to Plaintiff’s Remaining Claims to Supplemental Verified Complaint for Injunctive and Declaratory Relief (hereinafter Complaint) as follows:

INTRODUCTION

1. Paragraph 1 contains legal argument to which no response is required. To the extent a response is required, the cited authorities speak for themselves. To the extent the paragraph makes factual allegations, they are denied.

2. Paragraph 2 contains legal argument to which no response is required. Defendants admit that in 2018 the legislature of the State of Washington passed SSB 6219, which the governor signed into law. The bill and subsequent statute speak for themselves. Defendants otherwise deny the allegations in Paragraph 2.

3. Paragraph 3 is a legal argument requiring no response. To the extent it requires a response, Defendants deny the allegations in Paragraph 3.

NATURE OF THE CASE

4. Paragraph 4 is a legal argument requiring no response. To the extent a response is required, Defendants deny the characterization of RCW 48.43.065 in Paragraph 3. Defendants admit that Governor Jay Inslee signed SSB 6219 into law on March 21, 2019. SSB 6219 and RCW § 48.43.065 are legal authorities that speak for themselves. Defendants otherwise deny the allegations in Paragraph 4.

5. In Paragraph 5, Defendants admit that Cedar Park Assembly of God of Kirkland, Washington is a Christian church. Defendants lack sufficient knowledge to admit or deny the remainder of this paragraph, so the paragraph is therefore denied.

6. Paragraph 6 contains legal argument that requires no response, but to the extent a response is required, the statute speaks for itself, and Defendants otherwise deny Paragraph 6.

7. Defendants deny the allegations in Paragraph 7.

8. Paragraph 8 is a legal argument requiring no response. To the extent a response is required, Defendants admit the first two sentences of Paragraph 8. Defendants deny the third sentence of Paragraph 8.

JURISDICTION AND VENUE

9. Paragraph 9 is a legal argument requiring no response. Plaintiffs' claims speak for themselves, as modified by the Ninth Circuit and this Court's rulings on the claims.

10. Defendants admit Paragraph 10.

11. Paragraph 11 is a legal argument requiring no response. To the extent a response is required, the legal authorities speak for themselves. Defendants deny that declaratory relief is appropriate here.

12. Paragraph 12 is a legal argument requiring no response. To the extent a response is required, the legal authorities speak for themselves. Defendants deny that the requested injunctive relief is appropriate here.

13. Paragraph 13 is a legal argument requiring no response. To the extent a response is required, the legal authorities speak for themselves. Defendants deny that Plaintiff is entitled to reasonable attorneys' fees and costs.

14. Defendants admit that venue is proper with this Court. Defendants admit they reside in this district. Defendants otherwise lack sufficient knowledge to admit or deny the remaining allegations.

PARTIES

15. Defendants admit that Plaintiff Cedar Park Assembly of God of Kirkland, Washington is a Christian church. Defendants otherwise lack sufficient knowledge to admit or deny the remaining allegations, so they are denied.

16. Defendants admit that Defendant Myron “Mike” Kreidler is the Insurance Commissioner for the State of Washington, that he is sued in his official capacity only, and that the Insurance Commissioner is an elected official of the executive branch. Defendant Kreidler has responsibilities that include enforcement of Washington state insurance laws, including SSB 6219 and RCW § 48.43.065. To the extent Plaintiffs make additional allegations in this paragraph, they are denied.

17. Defendants admit that Defendant Jay Inslee is the Governor of the State of Washington, that he is sued in his official capacity, that he is the chief executive of the State of Washington. His duties include overseeing the executive branch, and has legal responsibilities for supervising the conduct of all executive offices, including the Insurance Commissioner

except as otherwise provided in the Revised Code of Washington and judicial precedent. The rest of the paragraph contains legal argument that does not merit a response or is vague. To the extent a response is required, the Defendants deny the remaining allegations.

FACTS

Cedar Park Assembly of God

18. Defendants lack sufficient information to admit or deny the allegations in Paragraph 18.

19. Defendants lack sufficient information to admit or deny the allegations in Paragraph 19.

20. Defendants lack sufficient information to admit or deny the allegations in Paragraph 20.

21. Defendants lack sufficient information to admit or deny the allegations in Paragraph 21.

22. Defendants lack sufficient information to admit or deny the allegations in Paragraph 22.

23. Defendants lack sufficient information to admit or deny the allegations in Paragraph 23.

Cedar Park's Beliefs Regarding the Sanctity of Human Life and Abortion

24. Defendants lack sufficient information to admit or deny the allegations in Paragraph 24.

25. Defendants lack sufficient information to admit or deny the allegations in Paragraph 25.

26. Defendants lack sufficient information to admit or deny the allegations in Paragraph 26.

27. Defendants lack sufficient information to admit or deny the allegations in Paragraph 27.

28. Defendants lack sufficient information to admit or deny the allegations in Paragraph 28.

29. Defendants lack sufficient information to admit or deny the allegations in Paragraph 29.

30. Defendants lack sufficient information to admit or deny the allegations in Paragraph 30.

31. Defendants lack sufficient information to admit or deny the allegations in Paragraph 31.

32. Defendants lack sufficient information to admit or deny the allegations in Paragraph 32.

33. Defendants lack sufficient information to admit or deny the allegations in Paragraph 33.

34. Defendants lack sufficient information to admit or deny the allegations in Paragraph 34.

35. Defendants lack sufficient information to admit or deny the allegations in Paragraph 35.

36. Defendants lack sufficient information to admit or deny the allegations in Paragraph 36.

37. Defendants lack sufficient information to admit or deny the allegations in Paragraph 37.

38. Defendants lack sufficient information to admit or deny the allegations in Paragraph 38.

Cedar Park's Employer-Sponsored Health Insurance

39. Defendants admit that Cedar Park offers health insurance to its employees. Defendants lack sufficient information to admit or deny the remainder of Paragraph 39.

1 40. Defendants lack sufficient information to admit or deny the allegations in
2 Paragraph 40.

3 41. Defendants lack sufficient information to admit or deny the allegations in
4 Paragraph 41.

5 42. Defendants lack sufficient information to admit or deny the allegations in
6 Paragraph 42.

7 43. Defendants lack sufficient information to admit or deny the allegations in
8 Paragraph 43.

9 44. Defendants lack sufficient information to admit or deny the allegations in
10 Paragraph 44.

11 45. Defendants lack sufficient information to admit or deny the allegations in
12 Paragraph 45.

13 46. Paragraph 46 contains legal argument that requires no response. To the extent a
14 response is required, Defendants deny the allegations in Paragraph 46.

15 47. Defendants lack sufficient information to admit or deny the allegations in
16 Paragraph 47.

17 48. Defendants lack sufficient information to admit or deny the allegations in
18 Paragraph 48.

19 48.1 Defendants lack sufficient information to admit or deny the allegations in
20 Paragraph 48.1.

21 48.2 Defendants lack sufficient information to admit or deny the allegations in
22 Paragraph 48.2.

23 48.3 Defendants lack sufficient information to admit or deny the allegations in
24 Paragraph 48.3.

Senate Bill 6219

49. The terms of SSB 6219 speak for themselves. To the extent Paragraph 49 raises further allegations, they are denied.

50. The terms of SSB 6219 speak for themselves. To the extent Paragraph 50 raises further allegations, they are denied.

51. Defendants deny the allegations in Paragraph 51.

52. Defendants deny the allegations in Paragraph 52.

53. Defendants deny the allegations in Paragraph 53.

54. The news article cited in Paragraph 54 speaks for itself. Defendants deny the allegation to the extent that it characterizes Sen. Hobbs as “*the* sponsor of SB 6219” (emphasis added). Defendants otherwise deny the allegations in Paragraph 54.

55. Paragraph 55 contains legal argument to which no response is required. To the extent that a response is required, Defendants deny the allegations in Paragraph 55.

56. Paragraph 56 contains legal argument to which no response is required. To the extent a response is required, the language of SB 6219 speaks for itself. To the extent Paragraph 56 makes further allegations, they are denied.

57. Defendants admit Paragraph 57.

58. Paragraph 58 contains legal argument to which no response is required. To the extent a response is required, the language of RCW 48.43.005(26) speaks for itself. To the extent Paragraph 59 raises further allegations, they are denied.

RCW § 48.43.065

59. Paragraph 59 contains legal argument to which no response is required. To the extent a response is required, RCW 48.43.065 speaks for itself.

60. Defendants admit that RCW 48.43.065 is under the same title and chapter as SSB 6219. The remainder of the allegation is legal argument that requires no response.

1 61. Paragraph 61 contains legal argument to which no response is required. To the
2 extent a response is required, RCW 48.43.065(2)(a) speaks for itself.

3 62. Paragraph 62 contains legal argument to which no response is required. To the
4 extent a response is required, RCW 48.43.065(2)(b) speaks for itself. To the extent Paragraph 62
5 raises further allegations, they are denied.

6 63. Paragraph 63 contains legal argument to which no response is required. To the
7 extent a response is required, the statute speaks for itself. To the extent there are factual
8 allegations in Paragraph 63, they are denied.

9 64. Paragraph 64 summarizes prior paragraphs and does not merit a response.
10 Paragraph 64 also contains legal argument to which no response is required. To the extent a
11 response is required, the statute speaks for itself.

12 65. Paragraph 65 contains legal argument to which no response is required. To the
13 extent a response is required, RCW 48.43.065(3) speaks for itself.

14 66. Paragraph 66 contains legal argument to which no response is required. To the
15 extent a response is required, RCW 48.43.065(3)(a) speaks for itself.

16 67. Paragraph 67 contains legal argument to which no response is required. To the
17 extent a response is required, RCW 48.43.065(3)(b) speaks for itself.

18 68. Paragraph 68 contains legal argument to which no response is required. To the
19 extent a response is required, RCW 48.43.065(3)(c) & (4) speak for themselves.

20 69. Defendants deny the allegations in Paragraph 69.

21 70. Paragraph 70 contains legal argument to which no response is required. To the
22 extent a response is required, the statute speaks for itself. To the extent Paragraph 70 makes
23 factual allegations, they are denied.

24 71. Paragraph 71 contains legal argument to which no response is required. To the
25 extent a response is required, Defendants admit that carriers may elect to pay for the coverage
26

1 of services to which an employer object by overhead or other means that are not directly charged
2 to the employer.

3 72. Paragraph 72 contains legal argument to which no response is required. To the
4 extent a response is required, Defendants deny the allegations.

5 73. Defendants admit that RCW 48.01.080 reads as quoted in Paragraph 73. To the
6 extent Paragraph 73 makes further allegations, they are denied.

7 74. Paragraph 74 contains legal argument to which no response is required. To the
8 extent a response is required, the statutory provisions cited speak for themselves. To the extent
9 Paragraph makes further allegations, they are denied.

10 75. Paragraph 75 contains legal argument to which no response is required. To the
11 extent a response is required, RCW 48.30.300 speaks for itself.

12 76. Paragraph 76 contains legal argument to which no response is required. To the
13 extent a response is required, RCW 48.30.010 speaks for itself.

14 **The Effect of SB 6219 on Cedar Park**

15 77. Paragraph 77 contains legal argument to which no response is required. To the
16 extent a response is required, Defendants lack sufficient information to admit or deny the
17 allegations.

18 78. Defendants deny the allegations in Paragraph 78.

19 79. Paragraph 79 contains legal argument to which no response is required. To the
20 extent a response is required, Defendants lack sufficient information to admit or deny the
21 allegations.

22 80. Paragraph 80 contains legal argument to which no response is required. To the
23 extent a response is required, Defendants lack sufficient information to admit or deny the
24 allegations.

25 81. Paragraph 81 contains legal argument to which no response is required. To the
26 extent a response is required, Defendants deny the allegations.

82. Paragraph 82 contains legal argument to which no response is required. To the extent a response is required, Defendants deny the allegations.

83. Defendants lack sufficient knowledge to admit or deny the allegations in Paragraph 83.

84. Defendants lack sufficient knowledge to admit or deny the allegations in Paragraph 84.

85. Defendants lack sufficient knowledge to admit or deny the allegations in Paragraph 85.

86. Paragraph 86 contains legal argument to which no response is required. To the extent a response is required, Defendants deny the allegations.

87. Paragraph 87 contains legal argument to which no response is required. To the extent a response is required, Defendants deny the allegations.

88. Defendants deny the allegations in Paragraph 88.

89. Paragraph 89 contains legal argument to which no response is required. To the extent a response is required, Defendants deny the allegations.

COUNT I

Violation of the Free Exercise Clause of the First Amendment to the United States Constitution

90. Paragraph 90 is a reincorporation of previous allegations and merits no response.

91. Defendants lack sufficient knowledge to admit or deny the allegations in Paragraph 91.

92. Defendants lack sufficient knowledge to admit or deny the allegations in Paragraph 92.

93. Defendants lack sufficient knowledge to admit or deny the allegations in Paragraph 93.

1 94. The last sentence of Paragraph 94 contains legal argument to which no response
2 is required. Defendants lack sufficient knowledge to admit or deny the remainder of the
3 allegations in Paragraph 94.

4 95. Paragraph 95 contains legal argument to which no response is required. To the
5 extent a response is required, Defendants lack sufficient knowledge to admit or deny the
6 allegations in Paragraph 95.

7 96. Paragraph 96 contains legal argument to which no response is required. To the
8 extent a response is required, Defendants deny the allegations in Paragraph 96.

9 97. Paragraph 97 contains legal argument to which no response is required. To the
10 extent a response is required, Defendants deny the allegations in Paragraph 97.

11 98. Paragraph 98 contains legal argument to which no response is required. To the
12 extent a response is required, Defendants deny the allegations in Paragraph 98.

13 99. Paragraph 99 contains legal argument to which no response is required. To the
14 extent a response is required, Defendants deny the allegations in Paragraph 99.

15 100. Paragraph 100 contains legal argument to which no response is required. To the
16 extent a response is required, Defendants deny the allegations in Paragraph 100.

17 101. Paragraph 101 contains legal argument to which no response is required. To the
18 extent a response is required, Defendants deny the allegations in Paragraph 101.

19 102. Paragraph 102 contains legal argument to which no response is required. To the
20 extent a response is required, Defendants deny the allegations in Paragraph 102.

21 103. Paragraph 103 contains legal argument to which no response is required. To the
22 extent a response is required, Defendants deny the allegations in Paragraph 103.

23 104. Paragraph 104 contains legal argument to which no response is required. To the
24 extent a response is required, Defendants admit that RCW 48.43.065 reads as quoted. Any
25 further allegations are denied.
26

1 105. Paragraph 105 contains legal argument to which no response is required. To the
2 extent a response is required, Defendants admit that SB 6219 reads as quoted. Any further
3 allegations are denied.

4 106. Paragraph 106 contains legal argument to which no response is required. To the
5 extent a response is required, Defendants admit that the Insurance Commissioner has approved
6 at least one plan that does not include services as required by RCW 48.43.065 because of a
7 religious objection. Defendants otherwise deny the allegations.

8 107. Paragraph 107 contains legal argument to which no response is required. To the
9 extent a response is required, Defendants deny the allegations.

10 108. Paragraph 108 contains legal argument to which no response is required. To the
11 extent a response is required, SB 6219 speaks for itself. Defendants otherwise deny the
12 allegations.

13 109. Paragraph 109 contains legal argument to which no response is required. To the
14 extent a response is required, RCW 48.43.005(26) and SSB 6219 speak for themselves.

15 110. Paragraph 110 contains legal argument to which no response is required.

16 111. Paragraph 111 contains legal argument to which no response is required. To the
17 extent a response is required, Defendants deny the allegations.

18 112. Paragraph 112 contains legal argument to which no response is required. To the
19 extent a response is required, Defendants deny the allegations.

20 113. Paragraph 113 contains legal argument to which no response is required. To the
21 extent a response is required, Defendants deny the allegations.

22 114. Paragraph 114 contains legal argument to which no response is required. To the
23 extent a response is required, Defendants deny the allegations.

24 115. Paragraph 115 contains legal argument to which no response is required. To the
25 extent a response is required, Defendants deny the allegations.

1 116. Paragraph 116 contains legal argument to which no response is required. To the
2 extent a response is required, Defendants deny the allegations.

3 117. Paragraph 117 contains legal argument to which no response is required. To the
4 extent a response is required, Defendants deny the allegations.

5 118. Paragraph 118 contains legal argument to which no response is required. To the
6 extent a response is required, Defendants deny the allegations.

7 119. Paragraph 119 contains legal argument to which no response is required. To the
8 extent a response is required, Defendants deny the allegations.

9 120. Paragraph 120 contains legal argument to which no response is required. To the
10 extent a response is required, Defendants deny the allegations.

11 121. Paragraph 121 contains legal argument to which no response is required. To the
12 extent a response is required, Defendants deny the allegations.

13 122. Paragraph 122 contains legal argument to which no response is required. To the
14 extent a response is required, Defendants deny the allegations.

15 123. Paragraph 123 contains legal argument to which no response is required. To the
16 extent a response is required, Defendants deny the allegations.

17 124. Defendants lack sufficient information to admit or deny the allegations in
18 Paragraph 124.

19 125. Defendants lack sufficient information to admit or deny the allegations in
20 Paragraph 125.

21 126. Paragraph 126 contains legal argument to which no response is required. To the
22 extent a response is required, Defendants deny the allegations.

23 127. Paragraph 127 contains legal argument to which no response is required. To the
24 extent a response is required, Defendants deny the allegations.

25 128. Paragraph 128 contains legal argument to which no response is required. To the
26 extent a response is required, Defendants deny the allegations. To the extent that Paragraph 128

1 relies on the Equal Protection Clause, the Ninth Circuit dismissed Cedar Park's Equal Protection
2 claim.

3 129. Paragraph 129 contains legal argument to which no response is required. To the
4 extent that Paragraph 129 relies on the Equal Protection Clause, the Ninth Circuit dismissed
5 Cedar Park's Equal Protection claim.

6 130. Paragraph 130 contains legal argument to which no response is required. To the
7 extent a response is required, Defendants deny the allegations.

8 131. Paragraph 131 contains legal argument to which no response is required. To the
9 extent a response is required, Defendants deny the allegations. To the extent that Paragraph 131
10 relies on the Equal Protection Clause, the allegation is denied because the Ninth Circuit
11 dismissed Cedar Park's Equal Protection claim.

12 132. Paragraph 132 contains legal argument to which no response is required. To the
13 extent a response is required, Defendants deny the allegations.

14 133. Paragraph 133 contains legal argument to which no response is required. To the
15 extent a response is required, Defendants deny the allegations.

16 134. Paragraph 134 is a prayer for relief that merits no response.

17 **COUNT II**

18 **Violation of the Equal Protection Clause of the** 19 **Fourteenth Amendment to the United States Constitution**

20 135. Paragraph 135 reincorporates prior allegations and merits no response.

21 136. The Court and the Ninth Circuit have dismissed this claim, and the paragraph is
22 therefore denied.

23 137. The Court and the Ninth Circuit have dismissed this claim, and the paragraph is
24 therefore denied.

25 138. The Court and the Ninth Circuit have dismissed this claim, and the paragraph is
26 therefore denied.

140. The Court and the Ninth Circuit have dismissed this claim, and the paragraph is therefore denied.

141. The Court and the Ninth Circuit have dismissed this claim, and the paragraph is therefore denied.

142. The Court and the Ninth Circuit have dismissed this claim, and the paragraph is therefore denied.

143. The Court and the Ninth Circuit have dismissed this claim, and the paragraph is therefore denied.

144. The Court and the Ninth Circuit have dismissed this claim, and the paragraph is therefore denied.

145. The Court and the Ninth Circuit have dismissed this claim, and the paragraph is therefore denied.

146. The Court and the Ninth Circuit have dismissed this claim, and the paragraph is therefore denied.

147. The Court and the Ninth Circuit have dismissed this claim, and the paragraph is therefore denied.

148. The Court and the Ninth Circuit have dismissed this claim, and the paragraph is therefore denied.

COUNT III

Violation of the Establishment Clause of the First Amendment to the United States Constitution

149. The Court and the Ninth Circuit have dismissed this claim, and the paragraph is therefore denied.

151. The Court and the Ninth Circuit have dismissed this claim, and the paragraph is therefore denied.

152. The Court and the Ninth Circuit have dismissed this claim, and the paragraph is therefore denied.

153. The Court and the Ninth Circuit have dismissed this claim, and the paragraph is therefore denied.

154. The Court and the Ninth Circuit have dismissed this claim, and the paragraph is therefore denied.

155. The Court and the Ninth Circuit have dismissed this claim, and the paragraph is therefore denied.

156. The Court and the Ninth Circuit have dismissed this claim, and the paragraph is therefore denied.

157. The Court and the Ninth Circuit have dismissed this claim, and the paragraph is therefore denied.

158. The Court and the Ninth Circuit have dismissed this claim, and the paragraph is therefore denied.

159. The Court and the Ninth Circuit have dismissed this claim, and the paragraph is therefore denied.

160. The Court and the Ninth Circuit have dismissed this claim, and the paragraph is therefore denied.

COUNT IV

Violation of Religious Autonomy Guaranteed by the Religious Clauses of the First Amendment to the United States Constitution

161. Paragraph 161 reincorporates previous allegations and merits no response.

164. Paragraph 164 contains legal argument to which no response is required. To the extent that a response is required, Defendants deny the allegations.

166. Paragraph 166 contains legal argument to which no response is required. To the extent that a response is required, Defendants deny the allegations.

168. Paragraph 168 contains legal argument to which no response is required. To the extent that a response is required, Defendants deny the allegations.

170. Paragraph 170 contains legal argument to which no response is required. To the extent that a response is required, Defendants deny the allegations.

172. Paragraph 172 is a prayer for relief that merits no response.

The Prayer for Relief constitutes legal arguments that require no response. To the extent a response is required, Defendants deny the prayer set forth by Plaintiff.

AFFIRMATIVE DEFENSES

Defendants further allege as follows:

A. Plaintiffs' Complaint fails to state a claim on which relief can be granted.

B. The injuries claimed were proximately caused by the fault of a party for whom Defendants are not responsible.

C. The separation of powers doctrine bars the Plaintiffs' claims.

D. Defendants enforce and approve insurance plans offered by carriers that exclude services to which Plaintiff has an objection based on religion or conscience.

NO WAIVER

The Defendant by their answers and omissions herein waive no burden of proof, presumptions, nor any other legal characterizations to which they may otherwise be entitled, and expressly reserve the right to assert such.

PRAYER FOR RELIEF

Defendants prays that Plaintiffs' remaining claims be dismissed with prejudice. The Defendant further prays that the Court award it its costs and reasonable attorneys' fees in defending against the Complaint, and such further or additional relief as the Court deems appropriate.

DATED this 16th day of March, 2022

ROBERT W. FERGUSON
Attorney General

/s/ Paul M. Crisalli

PAUL M. CRISALLI, WSBA #40681
JEFFREY T. SPRUNG, WSBA #23607
MARTA DELEON, WSBA #35779
Assistant Attorneys General
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-7744
paul.crisalli@atg.wa.gov
jeff.sprung@atg.wa.gov
marta.deleon@atg.wa.gov
Attorneys for Defendants

DECLARATION OF SERVICE

I hereby declare that on this day I caused the foregoing document to be electronically filed with the Clerk of the Court using the Court's CM/ECF System which will send notification of such filing to the following:

Kevin H. Theriot
Kristen K. Waggoner
Alliance Defending Freedom
15100 N 90th Street
Scottsdale, AZ 85260
(480) 444-0020
KTheriot@adflegal.org
KWaggoner@adflegal.org
Attorneys for Plaintiff

David A. Cortman
Alliance Defending Freedom
1000 Hurricane Shoals Rd. NE
Suite D-1100
Lawrenceville, GA 30040
(770) 339-0774
DCortman@adflegal.org
Attorney for Plaintiff

I declare under penalty of perjury under the laws of the State of Washington that the foregoing is true and correct.

DATED this 16th day of March 2022, at Seattle, Washington.

/s/ Paul M. Crisalli
PAUL M. CRISALLI, WSBA #40681
Assistant Attorney General